

KEVIN V. RYAN (CSBN 118321)  
 United States Attorney  
 EUMI L. CHOI (WBN 0722)  
 Chief, Criminal Division  
 PETER B. AXELROD (CSBN 190843)  
 LAUREL BEELER (CSBN 187656)  
 Assistant United States Attorneys

450 Golden Gate Avenue, 11th Floor  
 San Francisco, California 94102  
 Telephone: (415) 436-6774  
 Fax: (415) 436-7234

Attorneys for the United States

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
 Plaintiff,  
 v.  
 YOUNG JOON YANG, et al.,  
 Defendants

No. CR 05-00395 CRB

STIPULATION AND ~~PROPOSED~~  
 SUPPLEMENTAL PROTECTIVE ORDER  
 REGARDING DISCOVERY AS TO  
 DEFENDANT CHANG KUN KIM

UNITED STATES OF AMERICA,  
 Plaintiff,  
 v.  
 CHANG KUN KIM,  
 a/k/a Alex,  
 Defendant.

No. CR 05-00613 CRB

The United States, through its counsel of record, and defendant Chang Kun Kim, through his  
 counsel of record, hereby agree and stipulate that the government will provide discovery on the

1 following conditions:

2 1. Protected Material

3 The discovery produced in this matter is deemed Protected Material. Possession of  
4 copies of the Protected Material is limited to the defendants, their attorneys of record, and  
5 investigators, paralegals, law clerks, translators, interpreters, experts and assistants for the  
6 attorneys of record (hereinafter collectively referred to as "members of the defense team").

7 The defendants, their attorneys of record, and members of the defense team acknowledge  
8 that providing copies of the Protected Material to other persons is prohibited, and agree not to  
9 duplicate or provide copies of the Protected Material to other persons. The defendants, their  
10 attorneys of record, and members of the defense team may show Protected Material to witnesses  
11 or prospective witnesses in conjunction with their defense of the defendants in this case. The  
12 defendants, their attorneys of record, and members of the defense team further acknowledge that  
13 they are prohibited from using the Protected Material for any purpose other than defending the  
14 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a  
15 violation of the Protective Order. Further, the attorneys of record agree that prior to  
16 disseminating any copies of the Protected Material to members of the defense team, they will  
17 provide a copy of this Protective Order to members of the defense team.

18 Notwithstanding efforts taken by the government to redact personal information of  
19 witnesses from the discovery provided to the defense (such as date of birth, social security  
20 numbers, addresses, phone numbers, etc.), defense counsel, the defendants and members of the  
21 defense team agree that, should any such information be found during their review of this  
22 material, they will not provide that personal information in any form – whether in verbal, written  
23 or electronic format – to any third party, for any reason whatsoever.

24 2. Nontermination

25 The provisions of this Order shall not terminate at the conclusion of this prosecution but  
26 only upon further order of this Court. Within 30 days of a verdict or guilty plea, the defendants'  
27 attorneys of record shall return all copies of any Protected Material (including all copies provided  
28 to the defendants, their attorneys of record, and members of the defense team) to the United

1 States Attorney's Office for the Northern District of California.

2 SO STIPULATED.

3 DATED: March 14, 2006

4 /S/ PETER B. AXELROD \_\_\_\_\_  
PETER B. AXELROD  
LAUREL BEELER  
5 Assistant United States Attorneys

6  
7 DATED: March 14, 2006

8 /S/ ROBERT J. BELES \_\_\_\_\_  
ROBERT J. BELES  
Counsel for Defendant CHANG KUN KIM

9  
10 **ORDER**

11 IT IS SO ORDERED.

12  
13 DATED: March 16, 2006

14 ELIZABETH D. LAPORTE  
United States District Judge

